UNITED	<b>STATES</b>	DISTRICT	Γ COURT
SOUTHE	RN DIST	RICT OF	NEW YORK

BANCO POPULAR DOMINICANO, C. Por A.

Plaintiff and Counterclaim Defendant,

vs.

07 Civ. 6443 (LTS)(THK)

LEVI STRAUSS & CO.,

Defendant and Third Party Plaintiff,

vs.

INTERAMERICANA APPAREL COMPANY, INC.;
INTERAMERICANA PRODUCTS
INTERNATIONAL, S.A.; QST DOMINICANA
LLC; US PAPER & CHEMICAL; APPAREL
MACHINERY & SUPPLY CO.; YKK SNAP
FASTENERS AMERICA, INC.; SOUTHERN
TEXTILE DOMINICANA, INC; INDUSTRIA
CARTONERA DOMINICANA, S.A. (Smurfit);
THE GRAPHIC LABEL GROUP DOMINICANA,
INC.; and TAG-IT PACIFIC, INC.,

RULE 26(a) INITIAL DISCLOSURES

Third-Party Defendants.

## THIRD PARTY DEFENDANT'S FRCP 26(a) INITIAL DISCLOSURES

Third Party Defendant QST Dominicana, LLC ("QST"), by its attorneys, Vedder, Price Kaufman & Kammholz, P.C., hereby makes its initial disclosures to all parties having appeared in this action pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, as follows:

Rule 26(a)(1)(A) - Individuals likely to have discoverable information that QST may use in support of its claims:

- 1. Albert Madera General Manager.
- 2. Trevor Kussman Vice President, International Finance and Operations.

- 3. Jeffery Carlevato Treasurer, Chief Financial Officer, Chief Operations Officer.
- 4. Tom Stroponiatis Corporate Credit Manager.

QST reserves the right to supplement this list.

## Rule 26(a)(1)(B) - Documents that may be used in support of QST's claims:

- 1. Judgment from the Second Court of the Civil and Commercial Chamber of the First Instance in the Legal District of Santiago, Dominican Republic against Interamericana Apparel Company and against LS&CO in favor of QST in the amount of \$931,496.64 (the "DR Judgment").
  - 2. Certified English translation of the DR Judgment.
  - 3. Embargo served upon LS&CO by QST on or about February 21, 2007.

The documents listed above are enclosed herewith. QST reserves the right to supplement this list.

## Rule 26(a)(1)(C) – Computation of Damages

QST's damages are reflected by the aforementioned DR Judgment in the amount of \$931,496.64 plus interest.

## Rule 26(a)(1)(C) – Insurance Policy

Not Applicable.

Dated: New York, New York December 20, 2007 Respectfully submitted,

VEDDER, PRICE, KAUFMAN & KAMMHOLZ, P.C.

Ву: <u>/</u>

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